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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

BRIAN KEHLER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 15-CV-127-J
)	
BRIDGESTONE AMERICAS TIRE)	
OPERATIONS, LLC; COMMERCIAL TIRE,)	
INC. AND JOHN DOE CORPORATIONS 103,)	
)	
Defendants.)	

**BRIDGESTONE AMERICAS TIRE OPERATIONS, LLC'S
MOTION FOR LEAVE TO EXCEED PAGE LIMIT WITH ITS MOTION TO LIMIT
EXPERT TESTIMONY OF DENNIS CARLSON**

Defendant Bridgestone Americas Tires Operations, LLC ("BATO"), moves the Court pursuant to L.R. 7.1(b)(1)(C) to exceed the Courts' ten page limit by four pages with its Motion to Limit Expert Testimony of Dennis Carlson pursuant to F.R.E. 702 and *Daubert*, and in support thereof states as follows:

1. This is a product liability matter arising from the alleged failure of a Bridgestone tire on a Freightliner tractor being operated by Plaintiff Brian Kehler.

2. Plaintiff has offered Dennis Carlson as his tire expert in this case, and Carlson has rendered a host of different design and manufacturing defect opinions related to the failure of the subject Bridgestone tire.

3. In its Motion to Limit Testimony of Dennis Carlson, BATO does not seek the wholesale exclusion of Carlson, but rather requests an order prohibiting Carlson from offering three separate and distinct opinions. Specifically, BATO will seek to exclude Carlson's opinions:

- a. Regarding alleged defects with the steel belt joints in the tire;
- b. Regarding claimed adhesion defects evidenced by "liner pattern" marks; and
- c. Regarding claimed deficiencies in BATO's speed restriction warnings.

Each of these three opinions, and Carlson's methodological deficiencies for each, must be addressed in detail.

4. Moreover, the weaknesses in the Carlson opinions at issue were acknowledged by Carlson at his deposition in this matter, and BATO intends to quote from that testimony, adding further length to its brief.

5. BATO states that it conferred with counsel for Plaintiff about this motion and Plaintiff's counsel does not object to BATO's request for four additional pages.

WHEREFORE, due to the complex and numerous legal issues that must be addressed, Defendant Bridgestone Americas Tire Operations, LLC respectfully requests the Court's approval to exceed the ten page limit for its Motion to Limit Expert Testimony of Dennis Carlson by four pages.

Dated this 2nd day of September, 2016.

Defendant Bridgestone Americas Tire Operations, LLC

By: /s/ Robert E. Tonn

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served via CM/ECF on this 2nd day of September, 2016 upon the following parties:

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